

February 7, 2002

James De Luca, Chief  
U.S. Department of Labor/ ETA  
Division of Indian and Native American Programs (DINAP)  
200 Constitution Avenue, NW  
Room N-4641  
Washington, D.C. 20210

Dear Mr. De Luca,

Re: Tanana Chiefs Conference, Inc., WIA Supplemental Youth Employment Program,  
request for waiver.

As stated in the Federal Register (668.430 **What individuals are eligible to receive supplemental youth services**) paragraph (b) indicates that:

*Youth participants must be low-income individuals, except that not more than five percent (5%) who do not meet the minimum income criteria may be considered eligible if they meet one or more of the following categories ...*

Tanana Chiefs Conference, Inc. is requesting a waiver that will raise the percentage of non-income eligible youth that can receive our services. This request is based on the following reasons:

- We continually field complaints from Native Village Councils and other work sites that the income eligibility guidelines are unfair to the youth. They feel that all of the youth in the villages should have a chance to gain a work experience.
- Many of the youth are only slightly over the poverty level, yet their barriers to employment are the same as other youth in their community.
- Regardless of income, most youth in the village communities face a serious barrier to employment and employability because there often are no jobs for them to gain work experience, except through our program.

Alaska has the highest suicide rate in the United States at almost two times the national average. Alaska's Native population suicide rate is twice that, with a rate of almost five

- Many of the youth are only slightly over the poverty level, yet their barriers to employment are the same as other youth in their community.
- Regardless of income, most youth in the village communities face a serious barrier to employment and employability because there often are no jobs for them to gain work experience, except through our program.

Alaska has the highest suicide rate in the United States at almost two times the national average. Alaska's Native population suicide rate is twice that, with a rate of almost five times the national average. Youth ages 15-24 commit over half of these suicides. The lack of available jobs, recreation activities and events certainly contributes to these statistics.

We have suggested a raise in the income eligibility waiver from 5% of our possible youth participants to 30%. This would still maintain a majority of income-eligible youth, while at the same time, providing us with the flexibility and discretion to judge applicant needs on a case-by-case basis. If this occurs we can better serve all of the youth in our region and ensure that we are addressing the barriers that face them in their remote communities. Although we serve youth in the Fairbanks area as well, this waiver is predominately directed to youth living in Alaska Native Villages. Village youth and Fairbanks youth may share many of the same barriers; but it is clear that work experience opportunities are far greater for youth in Fairbanks, whereas in the villages, opportunities may be virtually non-existent.

Coincidental to this request is the addition of a **tribally defined barrier** to the *Eligibility Criteria, exceptions to income requirements*. Since living in a village, as noted above, is a severe barrier to gaining employability skills, residency in one of our service area villages is our tribally defined barrier.

In addition to the highly successful collaboration we have enjoyed with the administration in our member villages, we now have TCC AmeriCorps workers in 10 of those villages. Among other activities, these volunteers are working with constituents in the area of employment readiness and will be able to help identify, recruit and screen potential clients. We are also partnering with our Tribal Civilian Community Corps (a tribal residential AmeriCorps program) to provide employment and training assistance to WIA enrolled individuals in that program. As a partner with other tribal non-profits across the state, TCC is also a beneficiary of a YO! Grant and where possible WIA and the Youth Opportunity staff are working together to maximize available opportunities for our youth.

### C. Services

During this second round of WIA we will continue to place an emphasis on summer work experiences while integrating other service strategies for youth. We have teamed up with Alaska Vocational Technical Institute, which is offering a series of career exploration courses at their school in Seward. There are two courses; one is a weeklong career exploration and training shadowing program designed for high school students, and one is a three-week program designed for older, out of school youth. We have sent one group of students through the course as a "test run", and plan on taking greater advantage of this partnering opportunity in the future.